

JOHN G. DRONEBURG : NO. 19269 EQUITY  
 VS: : IN THE CIRCUIT COURT FOR  
 : FREDERICK COUNTY, SITTING  
 MARIE K. DRONEBURG : AS A COURT OF EQUITY

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BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of John G. Droneburg respectfully shows:

FIRST: That the said John G. Droneburg and Marie K. Droneburg, man and wife, were on the 27th day of October, 1959, divorced A VINCULO MATRIMONII by a Decree of the Circuit Court for Frederick County, sitting as a Court of Equity, said Decree duly filed among the Records of said Court in No. 19193 Equity.

SECOND: That being divorced, the said parties are now seized in fee simple, in equal shares, as tenants in common, of all that lot or parcel of land situate lying and being on the South East corner of North Market Street and East Seventh Street, in Frederick City, Frederick County, Maryland, said lot improved with a building known as 630 North Market Street, and being the same piece or parcel of land mentioned and described in a deed from Cora M. Staley, widow, to John G. Droneburg and Marie K. Droneburg, dated the 6th day of March, 1946, and recorded in Liber 452, Folio 359, one of the Land Records of Frederick County, Maryland; a duly certified copy of the said deed is herewith filed as a part hereof, marked "Exhibit A".

THIRD: That the said real estate is not susceptible of partition without material loss and injury to the parties entitled to interests therein as above stated, and that, in order to make division of said interests, it will be necessary that said real estate be sold, and the proceeds thereof divided amongst the parties according to their several interests.